

30(b)(6) Roland Joun Franconia Square, LLC - April 6, 2012
SSS Enterprises, Inc., et al. v. Nova Petroleum Realty, LLC, et al.

Page 1

1 BEFORE THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 ALEXANDRIA DIVISION
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5 - - - - - x
6 SSS ENTERPRISES, INC., :
7 et al., :
8 Plaintiffs, : Civil Action Number
9 vs. : 1:11cv1134 (CMH/JFA)
10 NOVA PETROLEUM REALTY, LLC, :
11 et al., :
12 Defendants. :
13 - - - - - x

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15 30(b)(6) DEPOSITION OF ROLAND JOUN
16 (FRANCONIA SQUARE, LLC)

17
18 Washington, D.C.
19 Friday, April 6, 2012

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21 REPORTED BY:
22 SARA A. WICK, RPR, CRR

1 30(b)(6) deposition of ROLAND JOUN, called for
2 examination pursuant to notice of deposition, on
3 Friday, April 6, 2012, in Washington, D.C., at the
4 offices of Bassman, Mitchell & Alfano, 1707 K Street
5 Northwest, Suite 560, at 12:22 p.m., before SARA A.
6 WICK, RPR, CRR, and a Notary Public within and for
7 the District of Columbia, when were present on
8 behalf of the respective parties:

9

10 PETER L. GOLDMAN, ESQ.
11 O'Reilly & Mark, P.C.
12 524 King Street
13 Alexandria, Virginia 22314
14 703-684-6476
15 pgoldmanatty@aol.com
16 On behalf of Plaintiffs

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1 APPEARANCES (continued):

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3 ALPHONSE MICHAEL ALFANO, ESQ.

4 Bassman, Mitchell & Alfano

5 1707 L Street Northwest

6 Suite 560

7 Washington, D.C. 20036

8 202-466-6502

9 aalfano@bmalaw.net

10 On behalf of Defendants

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1 of inquiry that are listed in the notice, and that
2 he will testify within those subject matter areas?

3 MR. GOLDMAN: The Plaintiff so stipulates.

4 BY MR. ALFANO:

5 Q Would you state your full name for the
6 record.

7 A It's Roland Joun, J-o-u-n.

8 Q Mr. Joun, we just had the deposition of
9 Metroil, Inc., and in the course of that deposition,
10 I asked you questions about yourself, about your
11 background, about your educational background, and
12 all of your interests in service stations. So we're
13 not going to repeat that here.

14 But if I were to ask you those same
15 questions, you would give me the same answers;
16 right?

17 A Yes.

18 Q Tell me about Franconia Exxon -- by the
19 way, the station, Franconia Square, LLC, was formed
20 when?

21 A 2001.

22 Q And where was it formed?

1 A Virginia.

2 Q And in 2001, what was your ownership
3 interest in the company?

4 A 50 percent.

5 Q And who had the other 50 percent?

6 A Sami. Actually, Samuel Todd, T-o-d-d.

7 Q And between 2001 and the present, have
8 those ownership interests remained the same?

9 A Yes. I just want to make sure that Samuel
10 Todd is the same as Sami Fakhouri, same person I
11 stated before.

12 Q So when we were talking about Georgetown
13 Exxon, you said that your partner was Sami Fakhouri?
14 In the previous deposition that we just had, you
15 mentioned --

16 A I mentioned Sami Fakhouri before, but I
17 don't know what was the content.

18 Q Are you saying he has two names?

19 A I know. You asked me who is your partner
20 in Franconia Square.

21 Q And you said Sami Fakhouri?

22 A Which is the same as Samuel Todd, same

1 name.

2 Q Same person?

3 A Same person, same person.

4 Q And who are the officers of the company?

5 A I am the president.

6 Q And Samuel?

7 A He is the vice president.

8 Q Is Franconia Square, LLC, involved in any
9 business other than the operation of a service
10 station located at 6136 Franconia Road, Alexandria,
11 Virginia?

12 A No.

13 Q And when I refer to the station at 6136
14 Franconia Road, I'm going to refer to it as
15 Franconia Shell.

16 Is that okay?

17 A Yes.

18 Q Who is presently in charge of the
19 day-to-day operation of Franconia Shell?

20 A I have a manager.

21 Q And what is the manager's name?

22 A Mustafa, M-u-s-t-a-f-a.